

AO 91 (Rev. 01/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
District of New MexicoUnited States of America  
v.

Isaac AGUIRRE

Defendant(s)

Case No: 25-1632 MJ

## CRIMINAL COMPLAINT

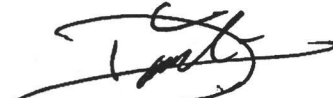
I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date of May 14, 2025 in the county of Dona Ana in the State and District of New Mexico, the defendant violated 8 U.S.C. § 1324(a)(1)(A)(v)(I)(Conspiracy to Violate 1324 - All subsections), an offense described as follows:

engaged in a conspiracy to commit a violation of 8 USC 1324(a)(1)(a)(v)(I) Conspiracy, to wit: 8 USC 1324(a)(1)(a)(ii) Transporting, knowing or in reckless disregard of the fact that, ALIENS, had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such aliens within the United States by means of transportation or otherwise, in furtherance of such violation of law.

This criminal complaint is based on these facts:

On Tuesday 5/13/2025, at approximately 11:40 pm, Border Patrol Agent (BPA1), was assigned line watch duties in Zone 17 (Sunland Park, NM) of the Santa Teresa Station Area of Responsibility (AOR). While BPA1 was performing his duties in his marked government vehicle, he witnessed a White in color Dodge Challenger in the area of Morrison Ln and Low Rd in Sunland Park, NM, making actions consistent with a vehicle looking to pick up illegal aliens. BPA1 noticed the Challenger leaving the area as soon as he saw his marked Border Patrol unit, raising suspicion. BPA1 followed the vehicle in order to obtain the license plate number and run registration checks on the Challenger.

☒ Continued on the attached sheet.



Complainant's signature

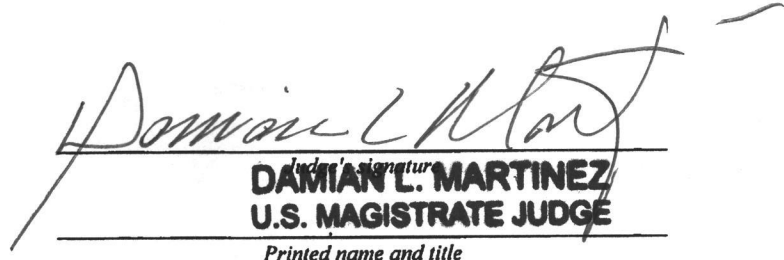
Daniel Calzada, Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: May <sup>15</sup> 16, 2025

City and state: Las Cruces, N.M.



DAMIAN L. MARTINEZ  
U.S. MAGISTRATE JUDGE

Printed name and title

CONTINUATION OF CRIMINAL COMPLAINT

STATE AND DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA

V.

Isaac AGUIRRE

**Continuation of Statement of Facts:**

At approximately 11:45 BPA1 contacted sector dispatch (880) via service radio, requesting registration checks on New Mexico plates. The checks revealed the vehicle was registered to an address out of Chapparral, NM, a town northeast of El Paso, TX, substantially far from Sunland Park, NM. As the Challenger turned eastbound on Sunland Park Dr from McNutt Dr, BPA1 advised 880 that he would be initiating a traffic stop.

BPA1 attempted to perform a traffic stop utilizing the unit emergency equipment, but the Challenger failed to yield and BPA1 initiated a pursuit. The vehicle continued at a high rate of speed through Sunland Park, NM traveled into Texas continuing to the New Mexico/Texas state line. The pursuit continued over New Mexico Hwy 404 known as the "Anthony Gap" heading east back into Texas. The pursuit ended approximately 37 minutes later with the subject crashing at approximately 12:22 am. The driver of the Challenger collided into a guardrail at the corner of NM Hwy 54 and Mesquite Hills while attempting to throw a handgun later identified as a semi-automatic Smith and Wesson, from the vehicle. BPA1 announced himself as a United States Border Patrol Agent and secured the driver in handcuffs placing him under arrest. After the subject was secured, BPA1 took possession of the handgun and placed it in a secure area. The subject, later identified as Isaac AGUIRRE, was transported to the Santa Teresa Border Patrol Station for further processing.

Isaac AGUIRRE (DRIVER PRINCIPAL) Post Miranda Statement:

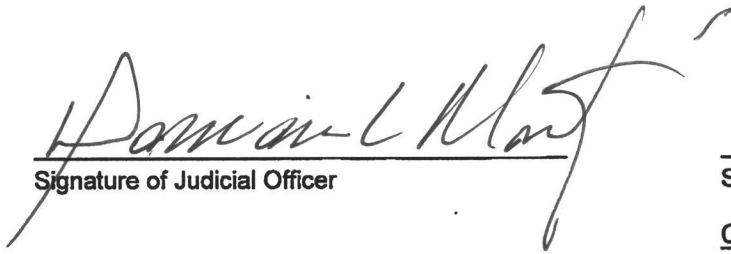
AGUIRRE readily admitted he was the driver of the White in color Dodge Challenger that was going to pick up 1 illegal alien who had made an illegal entry into the United States. AGUIRRE further stated he receives the alien smuggling jobs from a southside (Mexico) smuggler he knows. AGUIRRE stated he was in the area to pick up the illegal alien and further their illegal entry by taking them to a stash house in El Paso, TX. AGUIRRE admitted he was going to be monetarily compensated for each illegal alien he successfully transported to the stash house. Discovered conversations made between AGUIRRE and the southside (Mexico) Smuggler, on AGUIRRE's phone. They exchanged text and audio messages in regard to the Alien Smuggling Scheme which confirmed the above information.

**CONCLUSION**

Based on the aforementioned facts, your Affiant believes that there is probable cause to believe that Isaac AGUIRRE, along with other unknown individuals did violate Title 8 United States Code, Sections 1324 (a)(A)(v)(I).

New Mexico Assistant United States Attorney (AUSA) Joni Stahl was presented the case for prosecution. The case was accepted based on the aforementioned facts, Isaac AGUIRRE will be charged under 8 USC 1324 (Conspiracy and Transport).

**Continuation of Statutory Language:**



Signature of Judicial Officer



Signature of Complainant

Calzada, Daniel

Filing Agent